

AARON D. FORD  
Attorney General  
DOUGLAS R. RANDS, Bar No. 3572  
Senior Deputy Attorney General  
State of Nevada  
100 N. Carson Street  
Carson City, NV 89701-4717  
Tel: (775) 684-1150  
E-mail: drands@ag.nv.gov

*Attorneys for Defendants  
John Keast and Martin Naughton,*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ERIN WARE,

Plaintiff,

vs.

M. SULLIVAN, et al.

Defendants.

Case No. 3:22-cv-00037-ART-CSD

**LIMITED NON-OPPOSITION TO  
PLAINTIFF'S MOTION TO RE-OPEN  
DISCOVERY  
(ECF No. 68)**

Defendants, John Keast and Martin Naughton, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Douglas R. Rands, Senior Deputy Attorney General, hereby notify the Court that they have no stringent opposition to the Court reopening discovery as outlined in Plaintiff's motion, (ECF No. 68). However, if the Court is reopening discovery and setting new deadlines, a new dispositive motion deadline should be set as well. While the Court has already denied the Motion for Summary Judgment filed by the Defendants in this action, new discovery may reveal

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1 evidence that would support a renewal of the original motion. Therefore, respectfully,  
2 the Court should add a dispositive motion deadline to the new schedule.

3 DATED this 30th day of April, 2025.

4 AARON D. FORD  
5 Attorney General


6 By: /s/ Douglas R. Rands  
7 DOUGLAS R. RANDS, Bar No. 3572  
8 Senior Deputy Attorney General

9 *Attorneys for Defendants*  
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**CERTIFICATE OF SERVICE**

I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on April 30, 2025, I electronically filed the foregoing, **LIMITED NON-OPPOSITION TO PLAINTIFF'S MOTION TO RE-OPEN DISCOVERY (ECF No. 68)**, via this Court's electronic filing system. Parties that are registered with this Court's electronic filing system will be served electronically. For those parties not registered, service was made by depositing a copy for mailing in the United States Mail, first-class postage prepaid, at Carson City, Nevada, addressed to the following:

Luke Busby, Esq.  
Attorney at Law  
316 California Avenue  
Reno, Nevada 89509

  
An employee of the  
Office of the Nevada Attorney General